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Sylvia Lesse
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October 15, 2004

Via electronic filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: South Canaan Cellular Communications Company, L.P.
CC Docket No. 94-102
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Order to Stay,¹ South Canaan Cellular Communications Company, LP ("South Canaan") hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring the company's progress in deploying Phase II E911 technology.

South Canaan reiterates its request for waiver of Section 20.18(d) of the Commission's Rules (filed August 1, 2003). As indicated by the additional information provided herein, the public interest will be served by grant of the requested relief.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted


Sylvia Lesse
Counsel for South Canaan
Cellular Communications Company, LP

cc: John Muleta, Chief, Wireless Telecommunications Bureau
David Solomon, Chief, Enforcement Bureau
D'wana Terry, Chief, Public Safety & Critical Infrastructure Division
Eugenie Barton, Public Safety & Critical Infrastructure Division
Best Copy & Printing, Inc.
Mr. Bernie Swartwood, Pike County Communications

¹ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

SOUTH CANAAN CELLULAR COMMUNICATIONS COMPANY, LP.
E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
Third Quarter, 2004

South Canaan Cellular Communications Company, L.P. ("South Canaan" or "Company"), pursuant to the Commission's Order to Stay,¹ hereby provides an interim report to assist the Commission in monitoring South Canaan's progress in deploying Phase II E911 technology.²

I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

South Canaan's status with respect to Phase I and Phase II requests from PSAPs remains unchanged. South Canaan has received a valid Phase I request from Pike County and provides Phase I service to this county. South Canaan has also received a valid Phase II request from Pike County, and is continuing to work with Pike County to provide the requested Phase II service. The Company has not received a Phase I or a Phase II request from the other county it serves, Wayne County.

II. The carrier's specific technology choice:

The Company continues to report that a network-based Phase II solution is not economically or technically feasible and that it has no alternative but to convert its analog system to a CDMA network that supports a handset-based solution.

III. Status on ordering and/or installing necessary network equipment:

As previously reported, the Company has purchased and installed upgrades to its Lucent switch so that it will now support digital signals.³ The Company reports that it has completed the digital conversion of its fifth cell site. It is currently finalizing negotiations with Intrado, Inc., the service bureau which will maintain the location database and interface directly with the PSAP to provide location information that will accompany E-911 calls. The Company continues to remain on schedule to overlay its existing analog service with CDMA service by the end of 2004.

¹ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

² On August 1, 2003, South Canaan requested a limited and temporary waiver of the Commission's Phase II obligations ("Petition") and filed an E911 Phase II Interim Report for Tier III Carriers ("First Report"). In its Petition, South Canaan committed to providing quarterly progress reports. On November 10, 2003, South Canaan supplemented the Petition with updated information to further substantiate its request. See Supplement to Petition for Waiver of Section 20.18 of the Commission's Rules, CC Docket No. 94-102, filed Nov. 10, 2003 ("Supplement"). The Company filed progress reports on January 15, April 15, and July 15, 2004. The instant report serves as the Company's fifth quarterly progress report.

³ See Supplement at 2.

In anticipation of completion of the conversion of its network to CDMA, South Canaan has initiated the development of a subscriber educational campaign to encourage analog customers to transition to CDMA ALI-capable phones. Through these efforts, the Company anticipates that most of its customers will have migrated to CDMA ALI-capable phones by the end of 2007. South Canaan hereby provides further details regarding this campaign:

1. Continuation of on-going efforts to transition customers from analog to digital.
As previously reported, South Canaan has initiated sales of the Motorola 120E trimode phone, a phone that works on South Canaan's analog system and will provide Phase II location information on South Canaan's CDMA network once it becomes fully operational. In addition to the Motorola V60 which was available to subscribers as of the Company's last report, seven (7) additional models are now available to subscribers: Motorola E310 and C343, Audiovox 8600 and 8900, LG VX3100, and Kyocera Phantom and Slider phones. Compliant phones constitute 85% of new sales,⁴ and non-compliant phones will not be actively marketed after November, 2004
2. Marketing Campaign
As previously reported, after the CDMA system has been fully deployed in the beginning of 2005, the Company plans to initiate an aggressive marketing campaign targeting remaining analog customers with billing inserts and print advertising. The marketing efforts would emphasize that location information will not be available to emergency service providers unless the customers transition to CDMA ALI-capable phones. Customers that still have analog-only handsets will also be specifically targeted regarding the additional benefits of digital service.
3. Incentives to Convert to CDMA ALI-Capable Phones
Consideration is also being given to providing a rebate or other benefit to customers who turn in their analog or TDMA handset and purchase a CDMA phone. The Company plans to limit sales of analog phones to the general public once the CDMA network is fully deployed and tested. Analog phones will continue to be available in limited quantities for a limited period of time for those subscribers who require a 3-watt phone to obtain a signal.

IV. Information Regarding Availability of ALI-Capable Handsets

As reported above, South Canaan has added seven ALI-capable handsets to its stock. South Canaan anticipates that it incorporate additional ALI-capable models into its inventory as it approaches the time when it will begin to actively market its CDMA system.

⁴ Although dual-mode ALI-capable phones are being marketed, South Canaan continues to maintain that the public interest is better served by awaiting full system deployment before aggressively marketing CDMA ALI-capable handsets to subscribers. See Petition at 7 ("requiring sales of CDMA handsets before full system testing and deployment would result in customer dissatisfaction, as well as confusion as to when and where digital service is available").

V. The estimated date on which Phase II service will first be available in the carrier's network:

South Canaan continues to report that the anticipated date that it will begin selling and activating ALI-capable CDMA is January 1, 2005. Prior to the January 1, 2005 benchmark, South Canaan will have installed the necessary hardware and software in its CDMA network to provide Phase II service from its handset-based solution.

DECLARATION OF CAROLYN C. COPP

I, Carolyn C. Copp, President of SCCI, LLC, the General Partner of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "E911 Phase II Interim Implementation Report for Tier III carriers, Third Quarter, 2004" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

10/14/04

Date


Carolyn C. Copp